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12 Attorneys for Defendants

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN FRANCISCO DIVISION
17

18 ABRAHAM JAY KAHAN, Individually and on
19 Behalf of All Others Similarly Situated

20 Plaintiff,

21 vs.

22 SONY COMPUTER ENTERTAINMENT
23 AMERICA LLC and SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC,

24 Defendants,
25

Case No. 3:11-cv-02256-EMC

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Edward M. Chen

26 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA") and
27 Sony Network Entertainment International LLC ("SNEI"), as well as certain related entities
28

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 3:11-cv-02256-EMC

1 (collectively, the "Sony Defendants"), have been named as defendants in at least twenty-three
2 (23) putative class action lawsuits within this District, to date;

3 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
4 least eighteen (18) putative class action lawsuits pending outside this District, to date;

5 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
6 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
7 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
8 2011.

9 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
10 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
11 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
12 JPML;

13 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
14 by and through their respective counsel, hereby stipulate as follows:

15 The deadline for the defendants to respond to the Complaint in the above-captioned action
16 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
17 litigation centralizing the above-captioned action with other matters, or if centralization is denied
18 by the JPML, then 30 days from the date of such order denying centralization.

19 ///

1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 24, 2011

5 SETH M. LEHRMAN
6 STEWART JAFFE
7 FARMER, JAFFE, WEISSING, EDWARDS,
8 FISTOS & LEHRMAN, P.L.

9 By: /s/ Seth M. Lehrman /s/ [as authorized]
10 Seth M. Lehrman

11 Attorneys for Plaintiff
12 ABRAHAM JAY KAHAN

13
14 Dated: May 24, 2011

15 HARVEY WOLKOFF
16 THAD A. DAVIS
17 ROCKY C. TSAI
18 ROPES & GRAY LLP

19 By: /s/ Rocky C. Tsai /s/
20 Rocky C. Tsai

21 Attorneys for Defendants
22 SONY COMPUTER
23 ENTERTAINMENT AMERICA LLC;
24 SONY NETWORK ENTERTAINMENT
25 INTERNATIONAL LLC

26 **[PROPOSED] ORDER**

27 PURSUANT TO STIPULATION, IT IS SO ORDERED.

28 5/25/11

Dated: _____

By: _____

